APPENDIX F

DEFERRED ISSUES

The recommendations of the eight public advisory task forces were synthesized into a set of issues relevant to the development of the ISWP/EBEP. Those issues not addressed in the Policy, that is, those issues deferred until later in the ISWP/EBEP process, are listed below.

Chemical specific objectives

1. Identify potential methods for developing water quality objectives
2. Develop statewide water quality objectives for priority pollutants
3. Develop water quality objectives for the following pesticides: diazinon, carbofuran, malathion, and chlorpyrifos.
4. Update U.S. EPA "Gold Book" criteria for human health using current federal and State reference doses and cancer potency values.
5. Have a science advisory committee review the scientific rationale behind statewide human exposure factors (e.g., fish and drinking water consumption, body weight, reference doses, etc.).
6. Use statistical models to calculate distributions for statewide human exposure factors.
7. Recalculate U.S. EPA "Gold Book" criteria for aquatic life by screening suspect data, and adding new data.
8. Examine issues concerning dissolved vs. total recoverable metals in development of aquatic life objectives.
9. Develop a Memorandum of Understanding with CA Department of Fish and Game regarding protected species and water quality planning.

Site-specific objectives

1. Describe development of site-specific objectives.
2. Develop detailed guidance on the process for conducting studies for site-specific objectives.

Toxicity objectives

1. Address toxicity test variability.
2. Develop additional test acceptability criteria.
3. Evaluate alternative approaches to monitoring and controlling chlorine and ammonia toxicity.

Agricultural waters

1. Develop guidance on what constitutes various features of an agricultural system (e.g., on-farm ancillary structure, individual farm, agricultural field, and closed re-circulating system) for exemption from standards.
2. Identify the features of actual agricultural systems (e.g., agricultural production areas, ancillary structures, and individual closed re-circulating systems) for the purpose of determining exemptions.
3. Define types or categories of "water bodies dominated by agricultural drainage."
4. Develop technical criteria (guidance) for qualification as type/category of water body dominated by agricultural drainage.
5. Identify the water bodies dominated by agricultural drainage, by type or category based on qualifying criteria, in consultation with water management agencies.
6. Define new beneficial use(s) for water bodies dominated by agricultural drainage.
7. Clarify definition of "existing" uses.
8. Designate appropriate beneficial use(s) for water bodies dominated by agricultural drainage.
9. Develop water quality objectives for protection of new beneficial use(s).
10. Develop implementation provisions for water bodies dominated by agricultural drainage.
11. Describe relationship between water quality and water conservation.

Effluent dependent water bodies

1. Define "effluent-dependent water bodies".
2. Develop technical criteria (guidance) for qualification as effluent-dependent waters.
3. Identify effluent-dependent water bodies based on qualifying criteria.
4. Define new beneficial use(s) for effluent-dependent water bodies.
5. Designate appropriate beneficial use(s) for effluent-dependent water bodies.
6. Develop water quality objectives for protection of new beneficial use(s).
7. Develop implementation provisions for effluent-dependent water bodies.

Permitting and compliance issues

1. Describe the process used for identifying and prioritizing water bodies that are unable to meet a water quality objective(s) solely with technology-based controls (these impaired waters are considered for total maximum daily load [TMDL] development).
2. Develop guidance on data collection for impairment determination of water bodies.
3. Develop procedural guidance on TMDLs.
4. Develop technical guidance on TMDLs.
5. Establish procedures for deriving effluent limits for narrative water quality objectives other than the toxicity objective.
6. Describe implementation of anti-backsliding provisions.
7. Describe implementation of anti-degradation policies.

8. Develop a policy to promote integrated regional/watershed monitoring programs.
9. Develop guidance on design and implementation of monitoring programs.
10. Evaluate need for more pathogenic monitoring.
11. Develop a standardized format for monitoring data reporting.
12. Develop guidance on compliance determination.
13. Establish an enforcement policy which specifies the type of enforcement action to be taken in response to various degrees of exceedance of an effluent limit caused by analytical and reporting variability.
14. Establish compliance determination policy for permits without quantified limits.

Watershed issues

1. Document case studies on watershed management.
2. Promote regulatory flexibility through legal research and negotiation with U.S. EPA and other groups with a focus on permitting issues.
3. Provide support services, including: technical support, education, legislative support, and agency coordination (may be done in concert with the Nonpoint Source Program and Watershed Management Initiative).
4. Describe relationship between watershed management plans and other SWRCB and RWQCB programs, plans and policies (may be done in concert with the Watershed Management Initiative).
5. Describe relationship between watershed management and site-specific objectives.
6. Address "net environmental gain/benefit" and describe its relationship with TMDLs, agriculture, and watershed management.